



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 • (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR
TONI HARDESTY, DIRECTOR

February 13, 2007

VIA EMAIL

Mr. Greg Hall, Mechanical Engineer
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83702

RE: Facility ID No. 039-00025, Bennett Mountain Power Project, Mountain Home
Draft Tier I Operating Permit for Public Comment

Dear Mr. Hall:

The Department of Environmental Quality (DEQ) has prepared a draft Tier I operating permit for Idaho Power's Bennett Mountain Power Project, in accordance with IDAPA 58.01.01.300 through 386, *Rules for the Control of Air Pollution in Idaho*. The permit application, the draft permit, and the statement of basis prepared by DEQ will be made available for public review and comment in accordance with IDAPA 58.01.01.364. DEQ will schedule a 30-day public comment period during which you, in addition to any concerned individual or party, may submit written comments or request a public hearing on the permit.

At the end of the public comment period, DEQ will prepare a written response to the public comments and incorporate changes in the permit as appropriate. A proposed permit will then be submitted to the U.S. Environmental Protection Agency for its review as required by IDAPA 58.01.01.366.

If you have any questions regarding the draft permit or the public comment process, please contact me at (208) 373-0295 or zach.klotovich@deq.idaho.gov.

Sincerely,

Zach Klotovich

Zach Klotovich
Environmental Engineer

ZK Permit No. T1-060006

Enclosure

- ✓ Copy email to:
 - Bill Rogers
 - Mike Toole, Boise Regional Office
 - Betty Flowers
- ✓ Save letter to project folder
- ✓ Fill out Legal Notice and email Letter and Legal notice to Joan Lechtenberg
- ✓ Update permit tracking database



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T1-060006

FACILITY ID No.: 039-00025

AQCR: 63

CLASS: A

SIC: 4911

ZONE: 11

UTM COORDINATE (km): 608.4 , 4777.7

1. PERMITTEE

Idaho Power Company

2. PROJECT

Bennett Mountain Power Project – Initial Tier I Operating Permit

3. MAILING ADDRESS

1221 West Idaho Street

CITY

Boise

STATE

Idaho

ZIP

83702

4. FACILITY CONTACT

Mr. Greg Hall

TITLE

Mechanical Engineer

TELEPHONE

208-388-2506

5. RESPONSIBLE OFFICIAL

Mr. Vernon Porter

TITLE

General Manager, Power Production

TELEPHONE

208-388-2850

6. EXACT PLANT LOCATION

Approximately ½ mile northwest of intersection of Interstate 84 and Highway 20

COUNTY

Elmore

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Electric Power Generation

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.

ZACH KLOTOVICH, PERMIT WRITER

DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

DATE MODIFIED/AMENDED:

DATE EXPIRES:

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
TIER I OPERATING PERMIT SCOPE	4
FACILITY-WIDE CONDITIONS	5
EMISSIONS UNIT NO. 1 – ONE COMBUSTION TURBINE.....	12
EMISSIONS UNIT NO. 2 – ONE FUEL HEATER.....	16
INSIGNIFICANT ACTIVITIES.....	18
TITLE IV ACID RAIN PERMIT	19
TIER I OPERATING PERMIT GENERAL PROVISIONS	20
APPENDIX - ACID RAIN PERMIT APPLICATION.....	26

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppmv	parts per million by volume
PSD	Prevention of Significant Deterioration
PTC	permit to construct
permittee	Idaho Power Co.
RATA	relative accuracy test audit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 This operating permit is the facility's initial Tier I operating permit.
- 1.2 This Tier I operating permit incorporates the following permit:
- Permit to Construct No. P-050002, issued June 21, 2005.

Regulated Sources

- 1.3 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 0.1 REGULATED SOURCES

Permit Condition	Source Description	Emissions Control(s)
2	Facility-wide	n/a
3	One Siemens Westinghouse 501F Combustion Turbine	Dry Low NO _x combustors
4	One fuel heater	None

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006

Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 0.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.651; PTC No. P-050002	2.2, 2.3, 2.4, 2.16
2.5	Odors	Reasonable control	IDAPA 58.01.01.776.01; PTC No. P-050002	2.6, 2.16
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC No. P-050002	2.8, 2.16
2.9	Excess emissions	Compliance with IDAPA 58.01.01.120-126	IDAPA 58.01.01.120-126; PTC No. P-050002	2.9-2.9.5, 2.16
2.10	PM	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.677	2.16
2.11	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600.616	2.16
2.12	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.16
2.13	Risk management	Compliance with IDAPA 58.01.01.322 and 40 CFR 68	IDAPA 58.01.01.322; 40 CFR 68	2.16
2.14	Air Stagnation Advisory	Compliance with IDAPA 58.01.01.550-562	IDAPA 58.01.01.550-562; PTC No. P-050002	2.16
2.15	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	2.16

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[PTC Condition]
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive dust emissions.

[PTC Condition]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[PTC Condition]
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- [PTC Condition]
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- [PTC Condition]
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

- 2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01 and 02, 3/20/97]

- 2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- 2.9.5.1 An excess emissions file for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- 2.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Fuel-Burning Equipment

- 2.10 The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

Open Burning

- 2.11 The permittee shall comply with the Rules for Control of Open Burning, IDAPA 58.01.01.600-616.
[IDAPA 58.01.01.600-616, 4/5/00]

Renovation/Demolition

- 2.12 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.
[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.13 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:
- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
 - The date on which a regulated substance is first present above a threshold quantity in a process.
- [40 CFR 68.10(a)]

Air Stagnation Advisory Days

- 2.14 For all affected units, the permittee shall comply with the requirements of IDAPA 58.01.01.561 during any air pollution emergency episode.
[PTC Condition]

Performance Testing

- 2.15 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 / Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Monitoring and Recordkeeping

- 2.16 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.17 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 / Fax: (208) 373-0287

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

3. EMISSIONS UNIT NO. 1 – ONE COMBUSTION TURBINE

Summary Description

Table 3.1 describes the devices used to control emissions from the combustion turbine.

Table 0.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
One 170 MW Siemens Westinghouse 501F Combustion Turbine	Dry Low NO _x combustors

Table 3.2 contains only a summary of the requirements that apply to the combustion turbine. Specific permit requirements are listed below Table 3.2.

Table 0.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
3.1	NO _x	NSPS NO _x emissions limit	40 CFR 60.330	3.12, 3.13, 3.14
3.2	NO _x , CO	248.16 T/yr and 248.29 T/yr, respectively	PTC No. P-050002	3.13, 3.14
3.3	PM	0.015 gr/dscf at 3% O ₂	PTC No. P-050002	3.4
3.4	Fuel restrictions	Natural gas with sulfur content not to exceed 0.02 gr/dscf	PTC No. P-050002	3.8, 3.11
3.5	NO _x	Operation and upkeep of NO _x CEMS	40 CFR 75; PTC No. P-050002	3.7, 3.9, 3.12
3.6	CO	Operation and upkeep of CO CEMS	PTC No. P-050002	3.7, 3.10, 3.12
3.7	Turbine exhaust flowrate	Quantification methodology	PTC No. P-050002	3.12

Permit Limits / Standard Summary

- 3.1 On and after the date that performance test required by 40 CFR 60.8 is completed, the permittee shall not discharge into the atmosphere from the combustion turbine, any gases that contain NO_x in excess of:

$$STD = 0.0075 \frac{(14.4)}{Y} + F$$

where: STD = allowable NO_x emissions (percent by volume at 15% oxygen and on a dry basis)

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual, measured heat rate based on lower heating value of fuel as measured as actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emissions allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(3).

[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- 3.2 Emissions of NO_x and CO from the combustion turbine stack shall not exceed any corresponding emissions rate limits listed in Table 3.3.

Table 3.3 COMBUSTION TURBINE EMISSIONS LIMITS^a

Source Description	NO _x	CO
	T/yr	T/yr
Combustion Turbine	248.16	248.29

^aThe permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

[PTC Condition]

- 3.3 Emissions of PM from the combustion turbine shall comply with Permit Condition 2.10.

[PTC Condition]

Operating Requirements

- 3.4 The combustion turbine shall be fired exclusively by natural gas. The natural gas burned in the combustion turbine shall not contain sulfur in excess of 0.02 gr/dscf of natural gas.

[PTC Condition]

- 3.5 The permittee shall install, certify, operate, and maintain in accordance with the requirements of 40 CFR 75, a NO_x CEMS, consisting of a NO_x pollutant concentration monitor and an oxygen or carbon dioxide diluent gas monitor, with automated data acquisition and handling system for measuring and recording the NO_x concentration, in ppmv, and NO_x emission rate, in pounds per hour, discharged to the atmosphere from the combustion turbine stack. The permittee shall fully comply with all requirements set forth in 40 CFR 75, Subpart F and 40 CFR 60, Appendices B and F.

[PTC Condition]

- 3.6 The permittee shall install, certify, operate, and maintain a CEMS consisting of a CO pollutant concentration monitor and an oxygen diluent gas monitor. The CEMS shall be equipped with an automated data acquisition and handling system for measuring and recording the CO concentration, in ppmv, and CO emissions rate, in pounds per hour, discharged to the atmosphere from the combustion turbine stack. The permittee shall fully comply with all requirements set forth in 40 CFR 60, Appendices B and F.

[PTC Condition]

- 3.7 The permittee shall use the methodologies prescribed by Method 19 in 40 CFR 60, Appendix A, to quantify the turbine exhaust flowrate.

[PTC Condition]

Monitoring and Recordkeeping Requirements

- 3.8 The permittee shall monitor and record the amount of natural gas combusted in the turbine on an hourly basis. The amount shall be recorded as cubic feet per hour. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006

Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- 3.9 For the NO_x CEMS, the permittee shall fully comply with all monitoring requirements established by 40 CFR 72.9(b). The permittee shall fully comply with all monitoring and recordkeeping requirements set forth in 40 CFR 75, Subpart F and 40 CFR 60, Appendix F. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.
[PTC Condition]

- 3.10 The permittee shall perform RATAs on the CO CEMS, in accordance with 40 CFR 60, Appendix F. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.
[PTC Condition]

- 3.11 The permittee shall comply with the fuel sulfur and nitrogen monitoring provisions of 40 CFR Part 60.334(h) and 40 CFR Part 75, Appendix D. All data shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

The permittee may, upon EPA approval and DEQ notification, use a single sampling location to monitor fuel for both the Evander Andrews Power Complex, as well as the Bennett Mountain Power Plant.
[PTC Condition]

- 3.12 The permittee shall monitor and record the information listed below for the combustion turbine. The listed information shall be compiled in accordance with the emissions calculation protocol, submitted to DEQ on April 19, 2004. All data shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.
- The total NO_x emissions rate in tons per each calendar month after turbine startup.
 - The total, cumulative NO_x emissions rate in tons per each consecutive 12-month period.
 - The total CO emissions rate in tons per each calendar month after turbine startup.
 - The total, cumulative CO emissions rate in tons per each consecutive 12-month period.
- [PTC Condition]

Reporting Requirements

- 3.13 The permittee shall submit a test protocol to DEQ for each certification and recertification of the NO_x and CO CEMS required by Permit Conditions 3.9 and 3.10. Each test protocol shall be submitted to DEQ for approval at least 30 days prior to the respective test date. Alternately, the permittee may waive this reporting requirement by providing a certified statement that each recertification test will be performed in the same manner as the previously approved test protocols.
[PTC Condition]
- 3.14 All CEMS data submitted to EPA or DEQ shall meet the quality assurance procedures in 40 CFR 60, Appendix F.
[PTC Condition]
- 3.15 The results of any RATAs conducted for compliance shall be submitted to DEQ within 60 days of the completion of the test.
[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006

Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- 3.16 The permittee shall fully comply with the reporting requirements set forth in 40 CFR 75, Subpart G. In accordance with 40 CFR 75.60(b)(2), copies of all certification or recertification notifications, certification or recertification applications, and monitoring plans shall be submitted to DEQ. The copies shall be submitted to DEQ no later than the respective date specified in 40 CFR 75, Subpart G, for submission to the EPA Administrator.

In addition, the permittee shall submit a written report (including all raw field data, etc.) to DEQ for each certification or recertification test required in accordance with Permit Condition 3.12. Each report shall be submitted to DEQ within 60 days of the date on which the respective test was completed.

[PTC Condition]

- 3.17 For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions of NO_x that shall be reported are defined as any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average fuel consumption, ambient conditions, gas turbine load, nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

[PTC Condition]

- 3.18 The permittee shall submit a report of all excess emissions of SO₂ to DEQ in accordance with 40 CFR 60.7(b) through (d). For this report, excess SO₂ emissions are defined in 40 CFR 60.334(c)(2) as any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight.

[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

4. EMISSIONS UNIT NO. 2 – ONE FUEL HEATER

Summary Description

Table 4.1 describes the devices used to control emissions from the fuel heater.

Table 0.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Fuel heater	None

Table 4.2 contains only a summary of the requirements that apply to the fuel heater. Specific permit requirements are listed below Table 4.2.

Table 0.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
4.1	NO _x , CO	0.84 T/yr and 0.71 T/yr, respectively	PTC No. P-050002	4.5
4.2	PM	0.015 gr/dscf at 3% O ₂	PTC No. P-050002	4.3
4.3	Fuel restrictions	Natural gas with sulfur content not to exceed 0.02 gr/dscf	PTC No. P-050002	4.5, 3.11
4.4	Combustion rate	Not to exceed 16,878,613 cubic feet in any consecutive 12-month period	PTC No. P-050002	4.5

Permit Limits / Standard Summary

- 4.1 The NO_x and CO emissions from the fuel heater stack shall not exceed any corresponding emissions rate limits listed in Table 4.3.

Table 4.3 FUEL HEATER EMISSIONS LIMITS^a

Source Description	NO _x	CO
	T/yr	T/yr
Fuel Heater	0.84	0.71

^aThe permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

[PTC Condition]

- 4.2 Emissions of PM from the fuel heater shall comply with Permit Condition 2.10.

[PTC Condition]

Operating Requirements

- 4.3 The fuel heater shall be fired exclusively by natural gas. The natural gas burned in the fuel heater shall not contain sulfur in excess of 0.02 gr/dscf of natural gas.

[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- 4.4 The volume of natural gas combusted in the fuel heater shall not exceed 16,878,613 cubic feet in any consecutive 12-month period.

[PTC Condition]

Monitoring and Recordkeeping Requirements

- 4.5 A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request. The permittee shall monitor and record the following information:
- The total volume of natural gas combusted in the fuel heater in standard cubic feet per calendar month.
 - The total volume of natural gas combusted in the fuel heater in standard cubic feet per any consecutive 12-month period.

[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

5. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01.b.i are listed in the Tier I operating permit to qualify for a permit shield.

Table 5.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01.b.i Citation
None	n/a

- 5.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

6. TITLE IV ACID RAIN PERMIT

Statement of Basis

- 6.1 In accordance with IDAPA 58.01.01 (Rules for the Control of Air Pollution in Idaho) and Titles IV and V of the Clean Air Act, DEQ issues this permit pursuant to IDAPA 58.01.01.300.

[40 CFR 72.64]

Sulfur Dioxide Allowance Allocations and Nitrogen Oxides Requirements

- 6.2 The permittee is required to obtain SO₂ allowances, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of SO₂ for the previous calendar year from the unit, in accordance with 40 CFR 72.9(c). The source is not subject to NO_x emission limitations under 40 CFR Part 76. In addition, the following requirements apply:

- Emissions from the facility shall not exceed any allowances that the source lawfully holds.
- No limit is placed on the number of allowances held by the source and no permit revisions shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided such increases do not require a permit revision under any other applicable requirement.
- The source may not, however, use allowances as a defense for noncompliance with any other applicable requirement.
- Any such allowance shall be accounted for according to the procedures established in 40 CFR Part 72 and 40 CFR Part 73.

[40 CFR 72.9(c), 72.40(a), 72.50(a)(2), 72.50(a)(3), 76.1; IDAPA 58.01.01.322.12, 3/23/98].

Comments, Notes, and Justifications

- 6.3 The Phase II Acid Rain Permit incorporates by reference the definitions and terms of 40 CFR 72.2.

[40 CFR 72.50(b)]

Compliance with Permit Application

- 6.4 The permittee shall comply with the standard requirements and special provisions set forth in the EPA Phase II Acid Rain Permit Application, signed and dated April 5, 2005.

[40 CFR 72.9, 72.31(d), 72.50(a)(1)]

Permit Application

- 6.5 A copy of the Phase II Acid Rain Permit application is contained in the appendix of this Tier I operating permit.

[IDAPA 58.01.01.322.12, 5/1/94; 40 CFR 72.9]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

7. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

- 7.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
- 7.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- 7.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

- 7.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
- 7.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

- 7.6 This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

- 7.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- 7.8 Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §39-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

- 7.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

- 7.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.
[IDAPA 58.01.01.200-223, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]
- 7.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.
[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

- 7.12 Unless specifically identified as a “State-only” provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source’s potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.
[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]
- 7.13 Provisions specifically identified as a “State-only” provision are enforceable only in accordance with state law. “State-only” provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.
[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

Inspection and Entry

- 7.14 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

- 7.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/6/05; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

- 7.16 The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 7/1/02; 40 CFR 70.6(a)(7)]

Certification

- 7.17 All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 7.18 a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 7.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
 - Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
IDAPA 58.01.01.322.15.m, 325, 5/1/94; IDAPA 58.01.01.325, 3/19/99;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 7.20
- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6©(3) and (4)]

Periodic Compliance Certification

- 7.21 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- a. The permittee's reporting period for annual compliance certifications for all emissions units shall be from January 1 to December 31 of each year. The compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA within 30 days of the end of the specified reporting period.
- b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.
 - iv. Such other facts as DEQ may require to determine the compliance status of the source.
- d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-060006				
Permittee:	Idaho Power Co., Bennett Mountain	Facility ID No. 039-00025	Date Issued:	DRAFT
			Date Modified/Amended:	
Location:	Mountain Home, Idaho		Date Expires:	

False Statements

- 7.22 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

- 7.23 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

- 7.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 to and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

- 7.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

- 7.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

- 7.27 In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

Appendix

Acid Rain Permit Application



Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is: ☐ New ☒ Revised

STEP 1

Identify the source by
plant name, State, and
ORIS code.

Bennett Mountain Power Project 55733

STEP 2

Enter the unit ID#
for every affected
unit at the affected
source in column "a."
For new units, enter the
requested information in
columns "c" and "d."

a	b	c	d
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
CT01	Yes	2/21/2005	5/22/2005
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

Permit Requirements**STEP 3**
Read the
standard
requirements

- (1) The designated representative of each affected source and each affected unit at the source shall:
- (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
- (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
- (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
- (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

STEP 3,
Cont'd.

Excess Emissions Requirements

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

Step 3,
Cont'd.

Liability. Cont'd.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.

(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

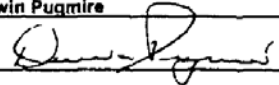
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

STEP 4

Read the
certification
statement,
sign, and
date

Name Darwin Pugmire	
Signature 	Date 7-5-05